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Attorneys for LIBERTY MUTUAL AUTO AND
HOME SERVICES, LLC dba LM GENERAL
INSURANCE COMPANY dba LIBERTY
MUTUAL INSURANCE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MEELAD DEZFOOLI,

Plaintiff,

v.

LIBERTY MUTUAL AUTO AND HOME
SERVICES, LLC dba LM GENERAL
INSURANCE COMPANY dba LIBERTY
MUTUAL INSURANCE, a Foreign Limited
Liability Company; DOES 1-10; and ROE
Entities 11 through 20, inclusive jointly and
severally,

Defendants.

Case No. 2:23-cv-00733-MMD-BNW

**STIPULATION AND ORDER TO STAY
LITIGATION**

Plaintiff, Meelad Dezfooli, and Defendants, Liberty Mutual Auto and Home Services, LLC
dba LM General Insurance Company dba Liberty Mutual Insurance ("Liberty Mutual"), hereinafter
collectively referred to as "the Parties" hereby stipulate to the following and move the Court
accordingly:

1. The parties have entered into an Agreement to have the contractual benefits
determined through private binding arbitration.

2. To effectuate the Agreement, the Parties agree and stipulate that this entire

1 proceeding be stayed to allow the Parties to conclusively determine the value of Plaintiff's personal
2 injury claims and, accordingly, the extent of his entitlement to contractual benefits.

3 3. The parties respectfully request that the hearing on August 29, 2023 be vacated as
4 the parties have agreed to subsume the extra-contractual causes of action as part of the binding
5 arbitration process.

6 It is the intent of the Parties that the Court retain its jurisdiction so as to be able to confirm
7 the award as a judgment.

8 **IT IS SO MOVED AND STIPULATED:**

9 DATED this 30th day of August, 2023

10 RUIZ LAW FIRM

11 By /s/ [Signature]
12 Lawrence Ruiz, Nevada Bar No. 11451
13 1055 Whitney Ranch Drive, Suite 110
14 Henderson, NV 89014
15 (702) 850-1717
16 Attorneys for Plaintiff

17 DATED this 31st day of August, 2023

18 McCORMICK, BARSTOW, SHEPPARD,
19 WAYTE & CARRUTH LLP
20 By /s/ [Signature]
21 Jonathan W. Carlson, Nevada Bar No. 10536
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23 Stacy Norris, Nevada Bar No. 15445
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25 Las Vegas, Nevada 89113
26 Tel. (702) 949-1100
27 Attorneys for Defendants

28 **ORDER**

IT IS SO ORDERED.

DATED this 31st day of August, 2023

By [Signature]
UNITED STATES DISTRICT JUDGE

9317628.1

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2023, a true and correct copy of **STIPULATION AND ORDER TO STAY LITIGATION** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Cheryl A. Schneider
Cheryl A. Schneider, an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP